



PERSONAL + SKILLED + MEMORY + REHAB

# Code of Conduct

FOR  
HOMELAND CENTER AND ITS RELATED ENTITIES

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## Scope of our Program

Our ***Compliance and Ethics Program Code of Conduct*** covers the compliance issues, laws and regulations, and guidelines that are relevant to a provider of senior services including Senior Living Communities that provide a wide range of healthcare services. This includes but is not limited to:

- Medicare and Medicaid regulatory issues;
- Guidelines from the Office of Inspector General, Internal Revenue Service, and the Office of Civil Rights of the Department of Health and Human Services,
- Occupational Safety and Health Administration;
- As well as other federal and state regulatory and business issues.

The program fosters a culture of compliance that promotes legal and ethical behavior in the workplace by creating processes that detect and prevent fraud, waste, abuse, and policy violations. **The *Code of Conduct* is supported by our compliance policies and procedures and should be read and understood jointly with those policies and procedures.**

We use the term ***Team Member*** to define the various individuals who are associated with Homeland Center. All individuals, including employees, contractors, volunteers, directors, and officers are members of our team in providing care and services to our Residents. We use the term ***Resident*** to refer to individuals who receive the various types of healthcare and other services that we provide.

Any questions regarding the policies in this *Code of Conduct*, compliance policies, or related references, should be directed to your immediate supervisor, or the Compliance Officer.

Homeland Center is a Continuing Care Retirement Community licensed under the laws of Pennsylvania to provide the following services:

- Skilled Nursing
- Therapy Services
- Personal Care
- Hospice
- Home Care
- Home Health
- Palliative Care

## The Chief Compliance Officer

Homeland Center's Compliance Officer is **Nicol M. Brown, NHA, Chief HR Officer**. She has the responsibility to assist the President/CEO, and the Board of Trustees in designing and overseeing efforts in establishing, maintaining, and monitoring compliance within our organization.

The Compliance Officer has direct reporting responsibility to the President/CEO and to the Board of Trustees. The Compliance Officer is responsible for the development, implementation, training, monitoring, and enforcement activities related to the overall compliance program. The Compliance Officer is assisted by legal counsel responsible for Corporate Compliance and Employment Law/Labor Relations.

## Compliance Program Management

Our Board of Trustees, through the President/CEO, carries the overall responsibility for creating a culture that values and emphasizes compliance, ethics, and integrity.

The Compliance Officer is responsible for coordinating the day-to-day compliance activities within the organization and through the use of outside entities as needed. These activities include but are not limited to billing audits, policy interpretation, responses to hotline calls, and engaging/leading the organization's Compliance Committee when deemed necessary.

Homeland Center's Compliance Committee is comprised of members of the Board of Trustees, Board of Managers, the President/CEO, Director of Finance, Director of Nursing, and other key staff positions as deemed necessary and appropriate. The Compliance Officer is the Chairperson for this committee. The committee meets at least annually and more frequently as needed.

## FROM OUR PRESIDENT/CEO

Dear Team Members:

We have a long history of providing healthcare services to those who have trusted their lives and end of their lives to us. Homeland's goal is to render services with deep compassion and the highest level of quality care possible. We also foundation our care and business decisions using the strong ethical and moral foundation Homeland was built upon.

The healthcare industry is a constantly changing environment impacted by numerous laws and regulations. In our desire to establish a culture that consistently complies with these laws and regulations, we have developed a Compliance and Ethics Program that supports and assists its employees in making the right decisions. This document, called the **Code of Conduct**, represents the primary areas of focus for our Compliance and Ethics Program. The *Code of Conduct* not only reflects our mission, ethics, and values but also serves as a bold statement that influences how we enhance our Residents', patients', and clients' quality of life.

The *Compliance and Ethics Program* and the *Code of Conduct* exist to guide our normal decisions that are both ethical and compliant with applicable laws, statutes, and regulations. ***Our Code of Conduct does not replace each person's obligation in making wise, fair, ethical, integral, and honest decisions. It is intended to explain our personal and organizational responsibility in the decision-making process and to reflect those areas in which improper, unwise, unethical, and dishonest decisions and choices can harm our entire organization, those that we serve, and yourself.***

We value each employee's individual contribution to our Residents, Patients, and Clients and appreciate your support in properly maintaining the most ethical workplace possible. We commend you for joining our commitment to honesty, ethics, compliance, and integrity, which are also part of Homeland Center's core mission and values. Each employee is responsible for helping to protect our work environment and its compliance with laws and regulations, and the goal to treat all in our environment with the same level of dignity, mutual respect, and cooperation one would expect. I thank you in advance for your commitment and contribution to Homeland Center's mission, values and, most importantly, your commitment to our Residents, Patients, and Clients.

Sincerely,

**Barry S. Ramper, II, NHA**  
**President/CEO**

# Homeland Center and Its Related Entities

## Code of Conduct

### Introduction

The *Code of Conduct* is the foundation of Homeland's *Compliance and Ethics Program*. The *Code of Conduct* is a guide to appropriate workplace behavior; it will help you make the right decisions if you are not sure how to respond to a situation. **All Employees must comply with both the spirit and the letter of all federal, state, and local laws and regulations, as well as internal policies and procedures that apply to the services that our organization provides, as well as all laws that apply to our business dealings.** Violations of these laws and regulations can result in severe penalties and significant legal action against us and the individuals we do work with including financial penalties, exclusion from participation in government funding programs, and, in some cases, imprisonment.

As Employees, we share a commitment to legal, ethical, and professional conduct in everything that we do. We support these commitments in our work each day, whether we care for Residents, order supplies, prepare meals, keep records, pay invoices, or make decisions about the future of our organization.

***The success of Homeland Center as a provider of healthcare and other services depends on you, your personal and professional integrity, your responsibility to act in good faith, and your obligation to do the right things for the right reasons.***

The *Compliance and Ethics Program* provides principles and standards to guide you in meeting your legal, ethical, and professional responsibilities. As a team member, you are responsible for supporting the Compliance and Ethics Program in every aspect of your workplace behavior. This begins with a commitment to always follow your job description, all associated policies and procedures, and the Resident's, Patient's, or Client's Care Plan in conjunction with your licensure and certification standards if you are a caregiver. Your continued working relationship with Homeland also includes understanding and adhering to the *Compliance and Ethics Program* by following the *Code of Conduct* continuously.

The *Code of Conduct* discusses the importance of:

**Care Excellence** – providing quality, compassionate, respectful, and clinically-appropriate care.

**Professional Excellence** – maintaining ethical standards of healthcare and business practices.

**Regulatory Excellence** – complying with federal and state laws, regulations, and guidelines that govern healthcare, housing services, and other services we provide.

### A Shared Responsibility

Because we are in the business of caring for and providing services for others, it is critical that each of us adheres to appropriate standards of behavior. As individuals and as an organization, we are responsible to many different groups. We must act ethically, responsibly, and professionally in our relations with:

- Residents, Patients, and Clients and their families; Colleagues and Co-workers; Volunteers and Affiliated Colleagues;
- Healthcare Payers, including the federal and state governments; Regulators, Surveyors, and Monitoring Agencies; Physicians, Nurse Practitioners, Physician Assistants.
- Vendors and Contractors; Business associates; and The Communities we serve.



Any compromise in our standards could harm our Residents, Patients, Clients, our Co-workers, and our organization. Like every organization that provides healthcare, we do business under very strict regulations and close government

oversight. Fraud, waste, and abuse are serious issues. Sometimes even an innocent mistake or unintentional act can have significant consequences that could result in substantial penalties to Homeland.

All employees and agents of Homeland are required to complete training on the *Code of Conduct* and the *Compliance and Ethics Program* as a condition of employment or business relationship. The *Code of Conduct* sets forth mandatory standards of behavior, ethics, and decision making for employees, volunteers, and vendors of Homeland Center and its related entities.

***There is no justification for departing from the Code of Conduct no matter what situation may arise.***

Every team member is responsible for ensuring that he or she complies with the Code of Conduct and all policies and procedures. Any team member who violates any of these standards and/or policies and procedures is subject to discipline up to and including termination.

## A Personal Obligation

As we are each responsible for following the *Code of Conduct* in our daily work, we are also responsible for enforcing it. This means that you have a duty to report any problems you observe or perceive, regardless of your role.

As a Team Member, you must commit to ensuring you are doing everything practical to comply with all requirements associated to your job description, applicable laws and regulations. You must commit to quality and compliance. *If you observe or suspect a situation that you believe may be unethical, illegal, unprofessional, or wrong, or you have a clinical, ethical, or financial concern, you must report it.* You are expected to satisfy this duty by complying with the **Three Step Reporting Process**. *If you fail to report noncompliance with the Code of Conduct, policies, and procedures, or applicable federal or state laws, you will be subject to discipline up to and including termination.* We have zero tolerance for retaliation. No one may retaliate against a Team Member who reports a concern in good faith. Anyone that participates in any form of retaliation will be disciplined up to and including termination from employment.



## Reporting Compliance Concerns

### The Three Step Reporting Process

**First**, talk to your immediate supervisor, who is responsible to forward this information. He or she is most familiar with the laws, regulations, and policies that relate to your work.

**Second**, if you do not want to talk to your supervisor or Department Director, contact a member of the Human Resources team.

**Third**, if you still have a concern, contact the Compliance Officer or the President/CEO.

**You may also call the toll-free Compliance Line number or enter an on-line complaint at any time.**

## Compliance Line

**Compliance Hotline at 1- 866-226-7542**

or

**[www.MyComplianceReport.com](http://www.MyComplianceReport.com)**

**Access ID: HLC**



***The Compliance Line is available 24 hours a day, 7 days a week***

**ALL REPORTING IS CONFIDENTIAL AND YOU CAN REMAIN ANONYMOUS IF YOU CHOOSE**

If you suspect an employee or agent of Homeland Center has violated the *Code of Conduct* or believe there is an issue, decision, or activity which violates or could potentially violate our mission, values, and ethics you are required to report this information to the Corporate Compliance Officer in person or anonymously.

Any Homeland Center employee or agent who violates Homeland Center's Code of Conduct will be disciplined accordingly, up to and including termination of employment, discontinuation of services and/or relationship with Homeland as required by the Compliance Plan. All concerns that are reported to the Compliance Line are taken seriously.

**You can make calls to the Compliance Line without fear of reprisal, retaliation, or punishment for your actions.**

*ANYONE, including a Board Member, Dept. Director, Asst. Director or Supervisor who retaliates against an employee for contacting the Compliance Line or reporting a compliance related issue in any other manner, will be disciplined to the fullest extent permissible by the plan.*

## Care Excellence



Our most important job is providing the highest level of quality care possible to our Residents, Patients, and Clients. This means offering compassionate support to them and working toward the best possible outcomes for their quality of life while following all applicable policies, procedures, rules, laws, and regulations, including the Medicare Conditions of Participation and CMS Federal regulations.

## Resident, Patient, and Client Rights

Residents receiving healthcare and other services have clearly defined rights. A document describing these rights is provided to each Resident upon admission and is posted in conspicuous locations throughout the organization for the Residents' and your reference. To honor these rights, we must:

- Make no distinction in the admission, transfer, or discharge of a Resident, or in the care we provide on the basis of race, gender, age, religion, national origin, disability, color, marital status, veteran status, medical condition, sexual orientation, or other protected class status, insurance, or financial status;
- Treat all Residents in a manner that preserves their dignity, autonomy, self-esteem, and civil rights;
- Protect every Resident from physical, emotional, verbal, or sexual abuse or neglect;
- Protect all aspects of Resident privacy and confidentiality;
- Respect Residents' personal property and money and protect it from loss, theft, improper use, and damage;
- Respect the right of Residents and/or their legal representatives to be informed of and participate in decisions about their care and treatment;
- Respect the right of Residents and/or their legal representatives to access their medical records as required by the Health Information Portability and Accountability Act (HIPAA);
- Recognize that Residents have the right to consent to or refuse care and the right to be informed of the medical consequences of such refusal;
- Protect Residents' rights to be free from physical and chemical restraints; and
- Respect the Residents' right to self-determination and autonomy.

## Abuse and Neglect

**Homeland will not tolerate any type of Resident abuse – physical, sexual, emotional/psychological, verbal, financial exploitation, or neglect.** Residents, Patients, and Clients must be protected from abuse and neglect by employees, family members, legal guardians, friends, or any other person. This standard applies to all Residents, Patients, and Clients at all times.

Federal law defines **Abuse** as the willful infliction of injury, unreasonable confinement, intimidation, or punishment with resulting physical harm, pain, mental anguish, or deprivation by an individual or caretaker of goods and services necessary to attain or maintain physical, mental, and psychosocial well-being. **Neglect** means failure to provide goods and services necessary to avoid physical harm, mental anguish, or mental illness. **This can include the failure to follow a Resident's**



**Care Plan or Nursing Care Instruction Sheet (NCIS) can be considered neglect and may constitute abuse depending upon the outcome to the Resident, Patient, or Client.**

The State of Pennsylvania defines abuse as *the infliction, unreasonable confinement, intimidation, or punishment with resulting physical harm or pain or mental anguish, or deprivation by an individual, including a caretaker, of goods or services that are necessary to attain or maintain physical, mental, and psychosocial well-being.* The term includes the following:

- **Verbal Abuse** – any use of oral, written or gestured language that willfully includes disparaging and derogatory terms to clients or their families, or within their hearing distance, regardless of age, ability to comprehend or disability;
- **Sexual Abuse** – includes sexual harassment, sexual coercion or sexual assault;
- **Physical Abuse** – includes hitting, slapping, pinching, kicking. The term also includes controlling behavior through corporal punishment or deprivation;
- **Mental Abuse** – Includes humiliation, harassment, threats of punishment or deprivation;
- **Involuntary Seclusion** – Includes separation of a Resident from other Residents from his or her room or confinement to his or her room against the Resident's will or the will of Resident's legal representative;
- **Neglect** – the deprivation by a caretaker of goods or services which are necessary to maintain physical or mental health.

**Any team member who abuses or neglects a Resident, Patient, or Client is subject to termination. In addition to potential legal or criminal action.**

**Abuse and/or Neglect MUST BE REPORTED IMMEDIATELY to the DON, NHA, Supervisor.**

## Elder Justice Act

*The Elder Justice Act requires timely reports of any reasonable suspicion of a crime against a Resident of a long-term care facility. You must report your reasonable suspicion to the Department of Human Services, local area Office on Aging, and local law enforcement within two (2) hours if the suspected crime involves serious bodily injury or within 24 hours if the suspected crime does not involve serious bodily injury.*

**DO NOT CALL THE COMPLIANCE LINE FOR ALLEGATIONS OF ABUSE OR NEGLECT.  
Report Abuse or Neglect Immediately to the DON, NHA, Charge Nurse or Supervisor!  
Immediately means within moments of witnessing or becoming aware of the incident!**

## Resident Confidentiality/HIPAA

All Employees must use and disclose medical, financial, or personal information only in a manner consistent with the HIPAA Privacy policies and procedures and state and federal law. *You are responsible for keeping Resident protected health information (PHI) confidential. PHI is defined as individually identifiable health information that is transmitted or maintained in any form or medium, including electronic health information.* Any unauthorized exposure of PHI which compromises the security or privacy of information is a potential breach.



***If you become aware of a breach of any protected or sensitive information, it is important that you report it immediately to your Supervisor or the Compliance Officer so the incident can be addressed and the information can be protected.***

If the disclosure results in a breach, Homeland Center must investigate and comply with all state and federal HIPAA regulations for breach notification.

## Resident Property

Employees must respect Residents' personal property and protect it from loss, theft, damage, or misuse. Employees who have direct access to Resident funds (e.g., Resident trust funds) must maintain accurate records and accounts.

## Providing Quality Care

As a CCRC, our primary commitment is to provide the care, services, and resources necessary to help each Resident, Patient, and Client reach or maintain his or her highest possible level of physical, mental, and psychosocial well-being. Homeland Center has policies and procedures and provides training and education to help each team member achieve this goal.

Our care standards include:

- Accurately assessing the individual needs of each Resident, Patient, and Client and developing interdisciplinary care plans that meet those assessed needs;
- Training, requiring, and ensuring all licensed and certified caregivers follow the Resident's, Patient's, and Client's care plans at all times
- Reviewing goals and plans of care to ensure that the Residents' ongoing needs are being met;
- Providing only medically necessary, physician prescribed services and products that meet the Residents', Patients', and Clients' clinical needs;
- Confirming that services and products (including medications) are within accepted standards of practice for the Resident's, Patient's, and Client's clinical condition;
- Ensuring that services and products are reasonable in terms of frequency, amount, and duration;
- Measuring clinical outcomes and Resident satisfaction to confirm that quality of care goals are met;
- Providing accurate and timely clinical and financial documentation and recordkeeping;
- Ensuring Residents, Patients, and Clients care is given only by properly licensed, certified, and credentialed providers with appropriate background, experience, and, expertise;
- Reviewing Resident, Patient, and Client care policies and procedures and clinical protocols to ensure they meet current standards of practice; and
- Monitoring and improving clinical outcomes through a Quality Assurance Performance Improvement (QAPI) Committee with established benchmarks.

## Medical Services

We are committed to providing comprehensive, medically necessary services for our Residents. The Medical Director provides oversight to physicians and other medical providers and services as defined by state and federal regulations. The Medical Director oversees the care and treatment policies and is actively involved in the Quality Assurance Performance Improvement (QAPI) Committee.

## Professional Excellence

The professional, responsible, and ethical reputation of our organization and the with Residents or in other areas that maintain our standards of honesty,



behavior of every team member reflects on the services we provide. Whether you work directly support Resident services, you are expected to integrity, and professional excellence, every day.

## Hiring and Employment Practices

Homeland Center is committed to fair employment practices. When hiring and evaluating, we:

- Comply with federal, state, and local Equal Employment Opportunity laws, hiring the best qualified individuals regardless of race, color, age, religion, national origin, disability, or any other protected class. All promotions, transfers, evaluations, compensation, and disciplinary actions also follow this policy.
- Conduct employment screenings to protect the integrity of our workforce and welfare of our Residents and Employees.
- Require all who need licenses or certifications to maintain their credentials in compliance with state and federal laws. Documentation of licenses or certifications must be provided.

## Employee Screening

Employees are screened in accordance with federal and state law to ensure the safety of our Residents. Screening procedures have been implemented and are conducted prior to hire and monthly thereafter.

***Homeland Center is prohibited by federal law from employing, retaining, or contracting with anyone who is excluded from any federal or state funded programs.*** Screening of all Employees through the Office of Inspector General's List of Excluded Individuals and Entities, GSA's System of Award Management, and the Pennsylvania Medicaid Excluded Provider List database is conducted prior to hire and monthly thereafter.

***As long as you are employed or affiliated with Homeland Center, you must immediately report to your supervisor:***

- *If you are arrested or indicted for a criminal offense;*
- *If you are convicted of an offense that would preclude employment in a healthcare facility;*
- *If action has been taken against your license or certification; or*
- *If you are excluded from participation in a federal or state healthcare program.*

## Licensure and/or Certification Verification

We are committed to ensuring that only qualified professionals provide care and services to Residents. Practitioners and other professionals treating Residents must abide by all applicable licensing, credentialing, and certification requirements. In addition, every effort is made to validate licenses and certification through the appropriate state or federal agency.

## Employee Relations

***Employee relations is the ways in which Homeland and its management staff are expected to interact with staff, deliver our corporate philosophy and policy information.*** This work is generally handled by Homeland's Human Resources Department, however management staff are expected to actively participate in the facilitation of Homeland's employee relations initiatives. There are many types of employee relations issues that can arise in the workplace. They include but are not limited to:

- improving workplace communication
- resolving workplace conflict
- clarifying company policy
- conducting workplace investigations
- monitoring overall employee performance and morale



- and the way to handle them can vary depending on the particular issue. However, there are some general guidelines to follow. One of them is to listen. Give your full attention and try to focus on what is being said both vocally and physically.

Employee relations also refers to Homeland’s commitment to creating a healthy, happy, and productive workplace that values its employees as stakeholders. A major key to fostering this environment is to educate and communicate clearly and often with Team Members. The more staff understand the policies, procedures, rules, and expectations and the consistency management uses in holding staff accountable when not followed, the better Homeland’s overall performance will be. This *Code of Conduct* and the Employee Handbook are examples of Homeland’s communication of such policies, procedures, rules, and expectations. The Code of Conduct and Employee Handbook create the ethical foundation for staff to make legally sound and regulatorily compliant decisions throughout their work day.

Creating a positive environment and work culture also helps employees want to actively participate in Homeland’s achievement of its goals. A positive and cohesive work environment helps people be more focused and better able to concentrate on their assignments. Employees not engaged in constant battles are much more eager to work together cooperatively.

To maintain an ethical, comfortable work environment, staff must:

- Treat all colleagues and co-workers with equal respect, regardless of their national origin, race, color, religion, sexual orientation, age, gender identity, or disability;
- Protect the privacy of other employees by keeping personal information confidential and allowing only authorized individuals access to the information.
- Report violations of law, regulation, policy, procedure, and ethics as required.
- Behave professionally and use respectful communication at all times.

## Workplace Safety

Maintaining a safe workplace is critical to the well-being of our Residents, visitors, and, co-workers. That is why policies and procedures have been developed describing the organization’s safety requirements. Every team member should become familiar with safety regulations and emergency plans regarding fire and disaster in his or her work area.

In addition to organizational policies, we must abide by all environmental laws and regulations. You are expected to follow organizational safety guidelines and to take personal responsibility for helping to maintain a secure work environment. ***If you notice a safety hazard, you must take action to correct it if you can or to report it to your supervisor immediately.***

## Drug and Alcohol Abuse

We are committed to maintaining a team dedicated and capable of providing quality Resident services. To that end, you are prohibited from consuming any substance that impairs your ability to provide quality services or otherwise perform your duties.

***You may never use, sell, or bring on our property illegal drugs, and/or narcotics or report to work under the influence of alcohol, illegal drugs, and/or narcotics. Reporting to work under the influence of a properly prescribed / legal drug when the drug impairs your ability to perform your duties is also prohibited.*** For a team member who appears to have work performance problems related to drug or alcohol use, a drug and alcohol screening will be conducted, and appropriate action will be taken, if necessary.

***Illegal, improper, or unauthorized use of any controlled substance that is intended for a Resident is prohibited. If you become aware of any improper diversion of drugs or medical supplies, you must immediately report the incident to your department supervisor, the Compliance Officer, the Compliance Officer, or use the Compliance Line.*** Failure to report a known instance of noncompliance with this policy may result in disciplinary action against the team member, up to and including termination.

## Organizational Relations

Professional excellence in organizational relations includes:

- Complying with federal tax law to maintain tax exempt status under section 501(c)(3) of the Internal Revenue Code;
- Maintaining company privacy and keeping proprietary information confidential.
- Avoiding outside activities or interests that conflict with responsibilities to Homeland and reporting such activity or interest prior to and during employment;
- Allowing only designated management staff to report to the public or media; and
- Requiring that Homeland Center complies with the licensing and certification laws that apply to its business.

## Proprietary Information

In the performance of your duties you, may have access to, receive, or may be entrusted with confidential and/or proprietary information that is owned by Homeland Center and that is not presently available to the public. This type of information should never be shared with anyone outside the organization without authorization from a member of the executive team.

Examples of proprietary information that ***should not*** be shared include:

- Resident and Team Member data and information;
- Details about clinical programs, procedures, and protocols;
- Policies, procedures, and forms;
- Training materials;
- Current or future charges or fees or other competitive terms and conditions;
- Current or possible negotiations or bids with payers or other clients;
- Compensation and benefits information for staff;
- Stocks or any kind of financial information; and
- Market information, marketing plans, or strategic plans.

## Gifts

***When our Residents, Patients, and Clients receive great care, they or their family members may wish to say “Thank You” with a gift. You may not accept or request any tip or gratuity from Residents, Patients, and Clients and you may not receive individual gifts from Residents, Patients, Clients, or their family members.*** Should they wish to “gift” you with anything and you feel compelled to accept the gift in their presence as to not appear rude, this gift (regardless of how small) must be immediately reported to and given to your immediate Supervisor. It is then the Supervisor’s responsibility to immediately report this information to the Compliance Officer for review and final determination.



In addition, you may not:

- You may not borrow money from nor lend money to Residents, Patients, or Clients;
- Nor may you engage with Residents, Patients, or Clients in the purchase or sale of any item.
- No team member may accept any gift from a Resident, Patient, or Client under a Will or Trust instrument, except in those cases where they are related by blood or marriage.
- Employees may not serve as a Resident’s, Patient’s, or Client’s Executor, Trustee, Administrator, Power

of Attorney, or Guardian unless this was a situation established long before their and the employee's receipt of services from Homeland. An additional exception would be in cases where they are related by blood or marriage, unless otherwise allowed by the state of Pennsylvania.

## Business Courtesies

Homeland Center prohibits any team member from offering, giving, soliciting, or accepting business or professional courtesies including entertainment and gifts that could be interpreted as attempts to influence decision making. Under no circumstances will a team member solicit or accept business courtesies, entertainment or gifts that depart from the Business Courtesies policy.

## Conflicts of Interest

A **Conflict of Interest** exists any time your loyalty to the organization is, or even appears to be, compromised by a personal interest or chance for personal gain. There are many types of conflict of interest and these guidelines cannot anticipate them all, however the following provides some examples:

- Financial involvement with vendors or others that would cause you to put their financial interests ahead of ours;
- Team member/Officer participation in public affairs, corporate or community directorships, or public office;
- An immediate family member who works for a vendor or contractor doing business with Homeland and who is in a position to influence your decisions affecting the work of that organization;
- Participating in transactions that put your personal interests ahead of Homeland Center or cause loss or embarrassment to Homeland;
- Taking a job outside of Homeland Center that overlaps or conflicts with your normal working hours or interferes with your job performance and/or job requirements; or
- Working for Homeland Center and another vendor that provides the same goods or services at the same time.

***All Employees must seek guidance and approval from our President/CEO and Compliance Officer before pursuing any business or personal activity that may constitute a conflict of interest.*** When in doubt, please do not hesitate to ask as that is the best way to avoid a potential appearance of impropriety.

## Use of Property

We must protect the assets (property) of the organization and ensure their authorized and efficient use. Theft, carelessness, and waste have a direct impact on the organization's viability. All assets must be used solely for legitimate business purposes.

Everyone must make sure they:

- Only use property for Homeland's business, not personal use, unless prior permission is granted;
- Exercise good judgment and care when using supplies, equipment, vehicles, and other property; and
- Respect copyright and intellectual property laws; or
- If unable to assess the copyright or intellectual property laws, never copy material and/or download software.

## Computers, Internet, and Company Cell Phones

Employees are expected to use computers, email, cell phones, and Internet/intranet systems appropriately and according to the established policy and procedure. You are not permitted to use the Internet for improper or unlawful activity or

download any games or entertainment without prior approval.

**Internet, email, and cell phone use can be Internet may be monitored. You should our computers, email, cell phones, and right to sanction or discipline employees cyber, or other non- face-to-face (email, You should be familiar with our Social Media**



**tracked and how you use your time on the have no expectation of privacy when you use internet/intranet system.** Homeland has the who violate the *Code of Conduct* in a digital, text, social media messaging) environment. policy and plan to abide by its requirements.

## Vendor Relationships

We take responsibility for being a good client and dealing with vendors honestly and ethically. We are committed to fair competition among prospective vendors and contractors for our business. Arrangements between Homeland Center and its vendors must always be approved by management. Certain business arrangements must be detailed in writing and approved by management. Agreements with contractors and vendors who receive Resident information, except for care providers, will require a *Business Associate Agreement (BAA)* with the organization as defined by HIPAA. Contractors and vendors who provide Resident care, reimbursement, or other services to Resident beneficiaries of federal and/or state healthcare programs are subject to the *Code of Conduct* and must:

- Maintain defined standards for the products and services they provide to us and our Residents, Patients, and Clients;
- Comply with all policies and procedures as well as the laws and regulations that apply to their business or profession;
- Maintain all applicable licenses and certifications and provide evidence of sanction screening, current workers compensation, and liability insurance as applicable; and
- Require that their employees comply with the *Code of Conduct* and the *Compliance and Ethics Program* and related training as appropriate.

## Marketing and Advertising

We use marketing and advertising activities to educate the public, increase awareness of our services, and recruit new Employees. These materials and announcements, whether verbal, printed, or electronic, will present only truthful, informative, non- deceptive information.

## Regulatory Excellence

Because we are in healthcare, we must follow the many federal, state, and local laws that govern our business. Keeping up with the most current rules and regulations is a big job – and an important one. We are all responsible for learning and staying current with the federal, state, and local laws, rules, and regulations, as well as the policies and procedures that apply to our job responsibilities.

## Billing and Business Practices

We are committed to operating with honesty and integrity. Therefore, all employees involved in the billing process or processes related to billing must ensure all statements, submissions, and other communications with Residents, Patients, and Clients, prospective admissions, the government, suppliers, and other third parties are truthful, accurate, and complete.

We are committed to ethical and honest billing practices and expect you to be vigilant in always maintaining these standards. ***We will not tolerate any false or inaccurate coding or billing. Any team member who knowingly submits a***

***false claim or provides information that may contribute to submitting a false claim such as falsified clinical documentation, to any payer – public or private – is subject to termination.*** In addition, legal or criminal action may be taken.

Prohibited practices include, but are not limited to:

- Billing for services or items that were not provided or costs that were not incurred;
- Duplicate billing - billing items or services more than once;
- Billing for items or services that were not medically necessary;
- Assigning an inaccurate code or Resident status to increase reimbursement;
- Providing false or misleading information about a Resident's condition or eligibility;
- Failing to identify and refund credit balances;
- Submitting bills without supporting documentation;
- Soliciting, offering, receiving, or paying a kickback, bribe, rebate, or any other remuneration in exchange for referrals; and/or
- Untimely and knowingly false entries into medical records.

**If you observe or suspect that false claims are being submitted or have knowledge of a prohibited practice, you must immediately report the situation to a supervisor, the Compliance Officer, or**

**Call the Compliance Hotline at 1- 866-226-7542**

**Failure to report a known and prohibited billing practice will subject you to disciplinary action, up to and including termination.**

## Referrals and Kickbacks

Employees and related entities often have close associations with local healthcare providers and other referral sources. To demonstrate ethical business practices, we must make sure that all relationships with these professionals are open, honest, and legal. Accepting kickbacks is against our policies, procedures, and against the law. A **Kickback** is anything of value that is received in exchange for a business decision such as a Resident, Patient, or Client referral. **Anything of value includes** any item or service of value including cash, goods, supplies, gifts, "freebies," improper discounts or bribes.

Resident, Patient, and Client referrals are accepted based solely on the clinical needs and our ability to provide the services. **Homeland Center never solicits, accepts offers, or gives anything of value in exchange for Resident referrals or in exchange for purchasing or ordering any good or service for which payment is made by a federal health care program.**

To assure adherence to ethical standards in our business relationships, you must:

- Verify all business arrangements with physicians, other healthcare providers, or vendors in a written document; and
- Comply with all state and federal regulations when arranging referrals to physician-owned businesses or other healthcare providers.

***You cannot request, accept, offer, or give any item or service that is intended to influence – or even appears to influence – the referral, solicitation, or provision of healthcare service paid for by any private or commercial healthcare payer or federal or state healthcare program, including Medicare and Medicaid, or other providers.***

## Inducements to Prospective Residents, Patients, and Clients

You may not provide anything of value, including goods, services, or money to prospective Residents, Patients, or Clients, or any beneficiary of a federal or state healthcare program that you know or should know, will likely influence that person's selection of a provider of healthcare services.

For the purposes of this policy, anything of value includes but is not limited to:



- any waiver of payment, gift, or free service that exceeds a value of \$20 per item or \$100 annually in total.

If you have a question about whether a particular gift or service would be considered “of value,” ask your Supervisor or the Compliance Officer.

## Copyright Laws

Many print and electronic materials are protected by copyright laws. Employees are expected to respect these laws and not reproduce electronic print or printed material without determining if permission is required and then obtaining that permission from the writer or publisher. If you are unsure if the material is protected by copyright laws, please ask your Supervisor or the Compliance Department.

## Financial Practices and Controls

Ensuring that financial and operating information is current and accurate is an important means of protecting assets. Each one of us must make sure that all information provided to bookkeepers, accountants, reimbursement staff, internal and external auditors, and compliance staff are accurate and complete. *This includes ensuring the accuracy of clinical documentation which supports our reimbursement. It also includes appropriate use of company issued credit cards and ensuring they are used appropriately, with approval, and for legitimate business purposes.* We must also comply with federal and state regulations when maintaining clinical records, accounting records, and financial statements, and cooperate fully with internal and external audits.

## Fair Dealing

All Employees must deal fairly with Residents, suppliers, competitors, and one other. No team member, manager, or director shall take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice.

## Document Creation, Use, and Maintenance

Every team member is responsible for the integrity and accuracy of documents, records, and e-mails including, but not limited to, Resident medical records, billing records, and financial records. No information in any record or document may ever be falsified or altered.

You may not and must not disclose, internally or externally, either directly or indirectly, confidential information except on a **need-to-know** basis and in the performance of your duties. Disclosure of confidential information externally is strictly prohibited unless your position grants you the authority to do so. Even then, it must follow Homeland policies and procedures regarding HIPPA and confidentiality.

Upon termination of employment, you must promptly return all confidential information, medical and/or business, to the Homeland. *Examples of confidential business information includes potential or threatened litigation, litigation strategy, purchases or sales of substantial assets, business plans, marketing strategies, organizational plans, financial management, training materials, fee schedules, department performance metrics, and administrative policies.*

It is our policy to voluntarily report known overpayments and any improper/irregular conduct, including fraudulent conduct, which affects any federal or state healthcare program. Reporting will be completed within the time frames identified under the Patient Protection and Affordable Care Act.

## Government Investigations

Homeland Center is committed to cooperating with requests from any governmental inquiry, audit, or investigation. You, in turn, are required to cooperate with such requests. In complying with our policy you must not:

- Lie or make false or misleading statements to any government investigator or inspector;
- Destroy or alter any records or documents;
- Attempt to persuade another team member or any person to give false or misleading information to a government investigator or inspector; or
- Be uncooperative with a government investigation.

If you receive a subpoena or other written or oral request for information from the government or a court, you must contact your Supervisor and the Compliance Officer, before responding.

## Disciplinary Action

***Disciplinary action will be taken against anyone who fails to act in accordance with this Code of Conduct, the Compliance and Ethics Program, supporting policies and procedures, and applicable federal, state, and local laws, regulations, ordinances.*** Disciplinary action may also be warranted in relation to violators of the *Compliance and Ethics Program* who fail to detect violations or who fail to respond appropriately to a violation.

When taking disciplinary action against a Team Member we will utilize standard disciplinary processes and render discipline with compassion whenever possible. Similarly, this could lead to the termination of business relationships and agreements depending upon what is learned through the course of the associated investigation.

The Compliance Officer will initiate and recommend corrective or disciplinary action against a Team Member utilizing:

- the progressive discipline process,
- the severity of the infraction,
- applicable legal and regulatory requirements, and
- guidance contained within the overall Compliance and Ethics program.

The Compliance Officer and President/CEO also monitor appropriate implementation of the disciplinary process to ensure consistent and uniform application. All should understand we will discipline anyone who utilizes or attempts to utilize the disciplinary process as a form of strictly prohibited discriminatory or retaliatory conduct against a peer, subordinate, or superior.

## Compliance Questions

The laws applicable to our operations are numerous and complicated. ***When you are not sure whether a particular activity or practice violates the law or the Compliance and Ethics Program, you should not guess the correct answer. Instead, you should immediately seek guidance from your department supervisor or the Compliance Officer. You will not be penalized for asking compliance-related questions as it is an opportunity to clarify and/or enhance overall understanding of how you can remain compliant while supporting Homeland's compliance goals.***

We are intent on creating a culture in which you should feel comfortable asking questions to ensure you understand the duties that are imposed upon you under this *Code of Conduct*, the *Compliance and Ethics Program*, your job description and associated policies and procedures, and other applicable federal, state, and local laws, regulations and ordinances..

## Conclusion

The *Compliance and Ethics Program* is critical to Homeland Center's continued success. You are crucial in ensuring the integrity of Homeland Center. The *Code of Conduct* and the *Compliance and Ethics Program* set standards for the legal, professional, and ethical conduct of our business. Some key points to remember are:

- Homeland Center and all of its Employees are committed to personal and organizational integrity, to acting in good faith, and to being accountable for our actions.
- The *Code of Conduct* and the *Compliance and Ethics Program* prepare us to deal with the growing complexity of ethical, professional, and legal requirements of delivering healthcare in the CCRC environment.
- The *Compliance and Ethics Program* is an ongoing initiative designed to foster a supportive work environment, provide standards for clinical and business conduct, and offer education and training opportunities for Employees.

The success of *Homeland Center's Compliance and Ethics Program* depends on our total commitment to act with integrity, both personally and as an organization. As a team member, your duty is to ensure the organization is doing everything practicable to comply with applicable laws. You are expected to satisfy this duty by performing your responsibilities in accordance with professional standards, the regulations guiding our business practices, and our policies and procedures.

### **Homeland Center's Chief Compliance Officer**

is

**Nicol M. Brown, NHA**  
**Chief HR and Compliance Officer**  
**Homeland Center and Its Related Entities**

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